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*Attorneys for Proposed Intervenor-  
Defendants DSCC, DCCC, and Montana  
Democratic Party*

UNITED STATES DISTRICT COURT  
DISTRICT OF MONTANA  
HELENA DIVISION

DONALD J. TRUMP FOR  
PRESIDENT, INC.; REPUBLICAN  
NATIONAL COMMITTEE;  
NATIONAL REPUBLICAN  
SENATORIAL COMMITTEE;  
MONTANA REPUBLICAN STATE  
CENTRAL COMMITTEE,

Plaintiffs,

v.

STEPHEN BULLOCK, in his official  
capacity as Governor of Montana;  
COREY STAPLETON, in his official  
capacity as Secretary of State of  
Montana,

Case No.: 6:20-cv-00066-DLC

**MOTION TO INTERVENE AS  
DEFENDANTS**

**EXPEDITED BRIEFING  
SCHEDULE REQUESTED**

*Motion to Intervene as Defendants*

Defendants,

and

DSCC, DCCC, and MONTANA  
DEMOCRATIC PARTY,

Proposed  
Intervenor-  
Defendants.

## **MOTION**

Pursuant to Federal Rule of Civil Procedure 24 and Local Rule 24.1, Proposed Intervenor-Defendants DSCC, DCCC, and Montana Democratic Party (collectively, “Proposed Intervenors”) move to intervene as defendants in the above-titled action. Proposed Intervenors respectfully request that this Court enter an order setting an expedited briefing schedule to resolve this Motion and allow Proposed Intervenors to file a response to Plaintiffs’ Motion for Preliminary Injunction, for which Plaintiffs are seeking responses by September 10, 2020. See ECF No. 16. This Motion is supported by Proposed Intervenors’ Brief in Support of Motion to Intervene as Defendants and Proposed Answer.

Proposed Intervenors seek intervention to oppose Plaintiffs’ Complaint for Declaratory and Injunctive Relief and Motion for Preliminary Injunction, which attempt to undo Defendant Stephen Bullock’s directive to permit counties to implement mail voting for the November 3, 2020 general election. In so doing,

Plaintiffs seek to undermine the State's efforts to protect Montana voters during an unprecedented public health crisis. Intervention is needed to protect Proposed Intervenors' substantial and distinct legal interests, which will otherwise be inadequately represented by the parties in this litigation.

Pursuant to Local Rule 7.1(c)(1), counsel for Proposed Intervenors has conferred with counsel for Plaintiffs Donald J. Trump for President, Inc., Republican National Committee, National Republican Senatorial Committee, and Montana Republican State Central Committee, and Plaintiffs have not provided Proposed Intervenors with a response regarding this Motion. Counsel for Proposed Intervenors has also conferred with counsel for Defendant Stephen Bullock, who has consented to this Motion. Defendant Corey Stapleton has yet to appear in this action.

Proposed Intervenors believe that expeditious consideration of this motion would serve judicial efficiency and ensure that they are able to protect their rights and interests. Accordingly, Proposed Intervenors respectfully request the following briefing schedule:

- Responses to Proposed Intervenors' Motion to Intervene as Defendants shall be filed on or before Tuesday, September 8, 2020; and
- Proposed Intervenors' reply briefs, if any, shall be filed on or before Thursday, September 9, 2020.

DATED this 4th day of September, 2020

By:

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*\*Pro hac vice application forthcoming*